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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 LEVI STRAUSS & CO.,

Case No. C 07-0245 PJH

12 Plaintiff,

13 v.
14 **STIPULATION TO FINAL
15 JUDGMENT AND PERMANENT
16 INJUNCTION**

17 SELF EDGE, *et al.*,

18 Defendants.

19 Plaintiff Levi Strauss & Co. and Defendant Self Edge hereby stipulate to the facts and
20 conclusions contained in the attached Final Judgment and Permanent Injunction and consent to its
21 entry by the court.

22 IT IS SO STIPULATED AND CONSENTED.

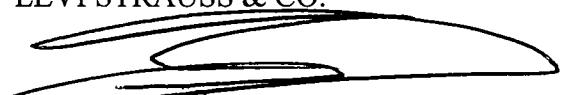
23 *July*
24 Dated: May 17, 2007


25 Gia L. Cincone
26 Townsend and Townsend and Crew LLP

27 ATTORNEYS FOR PLAINTIFF
28 LEVI STRAUSS & CO.

Dated: May ___, 2007

DEFENDANT SELF EDGE


25 Kiya Babzani

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LEVI STRAUSS & CO.,

Case No. C 07-0245 PJH

Plaintiff,

V.

SELF EDGE, *et al.*,

**[PROPOSED] FINAL JUDGMENT
AND PERMANENT INJUNCTION
AGAINST DEFENDANT SELF
EDGE**

Defendants.

Plaintiff Levi Strauss & Co. ("LS&CO.") has filed a Complaint alleging trademark infringement, dilution, and unfair competition under federal and California law against defendant Self Edge ("Self Edge"), among others, including Blue in Green, History Preservation Associates, Toyo Enterprise Co., Ltd., Samurai Co., Ltd., Studio d'Artisan International Co., Ltd., BS United, and Works Inc. (collectively "Defendants"). LS&CO. alleges that Self Edge has distributed, promoted, and sold clothing, including denim jeans and jackets manufactured by other Defendants, that violates LS&CO.'s rights in a number of its federally registered trademarks.

The Court now enters final judgment based upon the following undisputed facts. Each party has waived the right to appeal from this final judgment and each party will bear its own fees and costs in connection with this action.

I. FACTS AND CONCLUSIONS

A. This Court has subject matter jurisdiction over this lawsuit and personal jurisdiction over Self Edge. Venue is proper in this Court.

B. LS&CO. owns the following trademarks, which are registered as indicated below. These trademarks are referred to collectively as the "LS&CO. Trademarks."

1 1. The Arcuate Stitching Design Trademark. LS&CO. owns, among others, the
 2 following United States and California registrations for its Arcuate trademark as used on a variety of
 3 casual apparel:

4 a. U.S. Registration No. 1,139,254 (first used as early as 1873; registered
 5 September 2, 1980);
 6 b. U.S. Registration No. 404,248 (first used as early as 1873; registered
 7 November 16, 1943);
 8 c. U.S. Registration No. 2,791,156 (first used as early as September 1,
 9 1936; registered December 9, 2003);
 10 d. U.S. Registration No. 2,794,649 (first used as early as 1873; registered
 11 December 16, 2003);
 12 e. California Registration No. 088399 (first used as early as 1873;
 13 registered August 24, 1988).

14 2. The Tab Device Trademark. LS&CO. owns, among others, the following
 15 United States registrations for its Tab trademark as used on a variety of casual apparel:

16 a. Registration No. 356,701 (first used as early as September 1, 1936;
 17 registered May 10, 1938);
 18 b. Registration No. 516,561 (first used as early as September 1, 1936;
 19 registered October 18, 1949);
 20 c. Registration No. 577,490 (first used as early as September 1, 1936;
 21 registered July 21, 1953);
 22 d. Registration No. 774,625 (first used as early as May 22, 1963; registered
 23 August 4, 1964);
 24 e. Registration No. 775,412 (first used as early as October 9, 1957;
 25 registered August 18, 1964);
 26 f. Registration No. 1,157,769 (first used as early as September 1, 1936;
 27 registered June 16, 1961);
 28 g. Registration No. 2,791,156 (first used as early as September 1, 1936;

1 registered December 9, 2003).

2 3. The Shirt Tab Trademark. LS&CO. owns, among others, the following United
3 States and California registrations for its Shirt Tab trademark as used on shirts and jackets:

4 a. U.S. Registration No. 2,726,253 (first used as early as March 7, 1969;
5 registered June 17, 2003);

6 b. California Registration No. 052312 (first used as early as March 7,
7 1969; registered June 12, 1974).

8 4. The Housemark Design Trademark. LS&CO. owns, among others, the
9 following United States registrations for its Housemark trademark used in connection with a variety of
10 casual apparel:

11 a. Registration No. 849,437 (first used as early as October 10, 1966;
12 registered May 21, 1968);

13 b. Registration No. 1,135,196 (first used as early as April 15, 1975;
14 registered May 13, 1980);

15 c. Registration No. 1,041,846 (first used as early as April 15, 1975;
16 registered June 22, 1976);

17 d. Registration No. 1,122,468 (first used as early as October 22, 1977;
18 registered July 17, 1979);

19 e. Registration No. 1,155,926 (first used as early as December 1970;
20 registered May 26, 1981).

21 5. The Two Horse Design Trademark. LS&CO. owns, among others, the
22 following United States registrations for its Two Horse trademark as used on pants, jeans, shorts,
23 skirts and other bottoms:

24 a. Registration No. 523,665 (first used as early as January 1, 1886;
25 registered April 1, 1950);

26 b. Registration No. 1,140,853 (first used as early as January 1, 1886;
27 registered October 28, 1980).

28 6. The 500 Trademarks. LS&CO. owns, among others, the following United

1 States registrations for its 500 family of trademarks as used on a variety of casual apparel:

2 a. Registration No. 1,552,985 (first used as early as December 31, 1969;
3 registered August 22, 1989) (501®);

4 b. Registration No. 1,313,554 (first used as early as June 27, 1983;
5 registered January 8, 1985) (505®);

6 c. Registration No. 1,319,462 (first used as early as June 27, 1983;
7 registered February 12, 1985) (517®);

8 d. Registration No. 2,503,976 (first used as early as May 1, 1998;
9 registered November 6, 2001) (569®).

10 C. The LS&CO. Trademarks are valid and famous trademarks of LS&CO., and LS&CO.
11 has the exclusive right to use those trademarks throughout the world.

12 D. Self Edge has distributed, promoted, and sold jeans under a number of brand names,
13 including SUGAR CANE, SAMURAI JEANS, and IRON HEART. These jeans have displayed
14 some of the following designs:

- 15 a. The pocket stitching designs illustrated in Exhibit A;
- 16 b. The tabs illustrated in Exhibit B;
- 17 c. The shirt tabs illustrated in Exhibit C;
- 18 d. The labels and pocket flashers illustrated in Exhibit D;
- 19 e. The patches illustrated in Exhibit E; and/or
- 20 f. The numerical designations illustrated in Exhibit F.

21 The designs shown in Exhibits A-F are confusingly similar to the LS&CO. Trademarks, have been
22 used on directly competing products, and are collectively referred to as the "Restricted Designs."

23 **II. PERMANENT INJUNCTION.**

24 It is hereby ordered and adjudged as follows:

25 A. Commencing as of the "So Ordered" date of this Final Judgment and Permanent
26 Injunction, Self Edge, its principals, agents, affiliates, employees, officers, directors, servants, privies,
27 successors, and assigns, and all persons acting in concert or participating with it or under its control
28 who receive actual notice of this Order, are hereby permanently enjoined and restrained, directly or

1 indirectly, from doing, authorizing or procuring any persons to do any of the following:

2 1. Manufacturing, licensing, selling, offering for sale, distributing, importing,
3 exporting, advertising, or promoting any garments that display the Restricted Designs or any other
4 design that is confusingly similar to any of the LS&CO. Trademarks or the Restricted Designs;

5 2. Manufacturing, licensing, selling, offering for sale, distributing, importing,
6 exporting, advertising, or promoting any garments that display any pocket design, tab, label, hangtag,
7 patch, numerical designation, or any other label, design, or device that may reasonably be believed to
8 be as similar or more similar to any of the LS&CO. Trademarks than the Restricted Designs;

9 3. Violating the rights of LS&CO. in and to any of its trademarks;

10 4. Assisting, aiding or abetting any person or entity engaging in or performing any
11 act prohibited by this paragraph.

12 C. This Judgment shall apply throughout the world to the fullest extent of this Court's
13 jurisdiction.

14 D. This Court shall retain jurisdiction for the purpose of making any further orders
15 necessary or proper for the construction or modification of this Judgment, the enforcement thereof,
16 and/or the punishment for any violations thereof. In the event of any violation of this Permanent
17 Injunction, Self Edge shall be responsible to pay LS&CO., at a minimum, all of LS&CO.'s fees and
18 costs associated with this action as well as any enforcement or contempt proceedings. For the purpose
19 of any future proceeding to enforce the terms of this Judgment, service by mail upon a party or their
20 counsel of record at their last known address shall be deemed adequate notice for each party.

21 DATED: 7/25/07

22 60971982 v1



Exhibit A



Exhibit A-1



Exhibit A-2

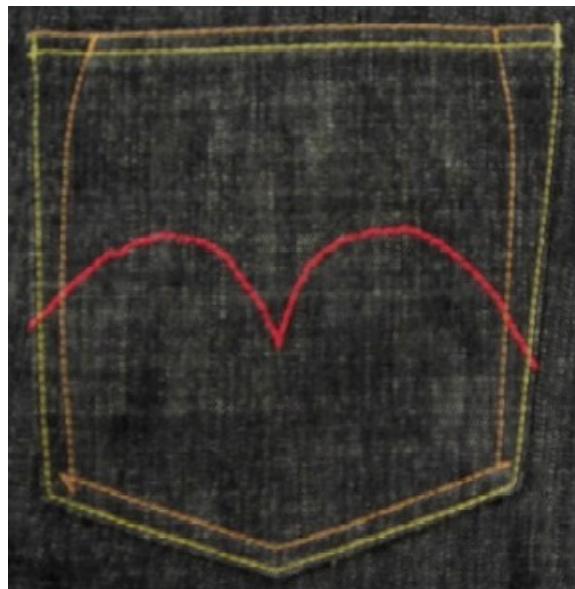


Exhibit A-3



Exhibit A-4

Exhibit B



Exhibit B-1



Exhibit B-2

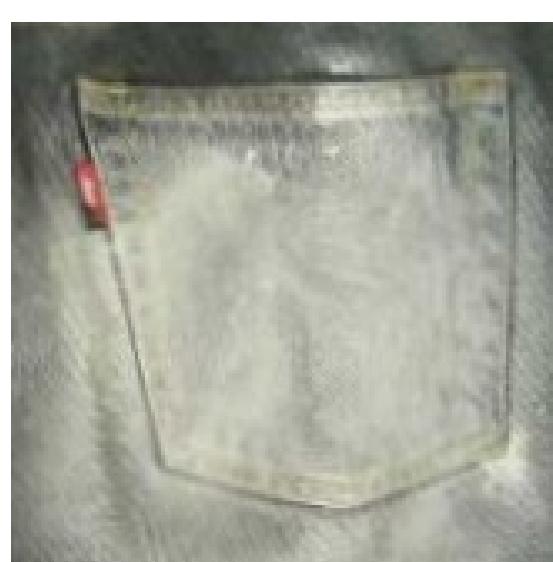


Exhibit B-3



Exhibit B-4

Exhibit C



Exhibit C-1



Exhibit C-2

Exhibit D

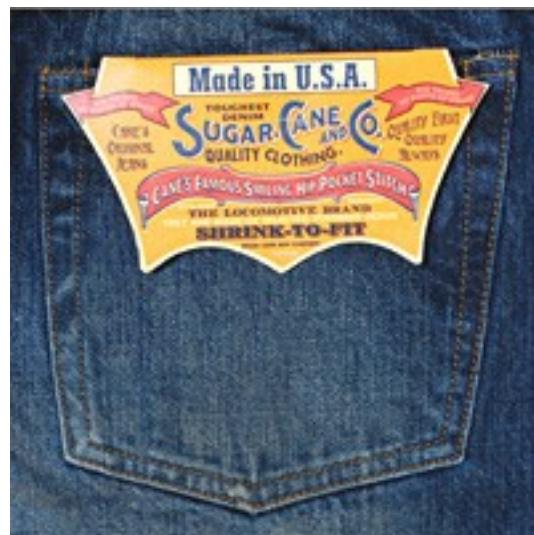


Exhibit D

Exhibit E

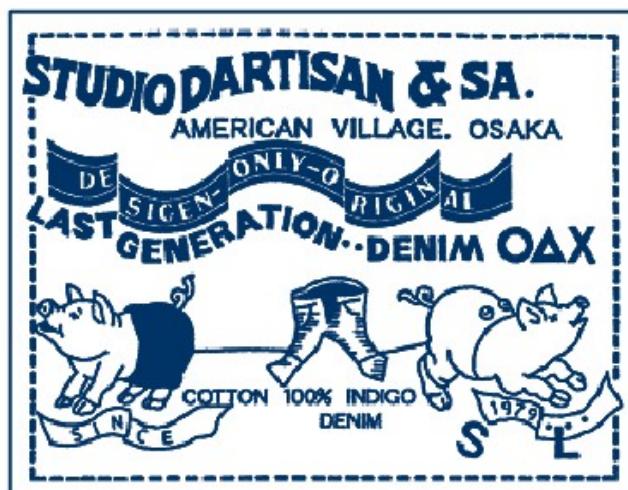


Exhibit E

Exhibit F



Exhibit F-1

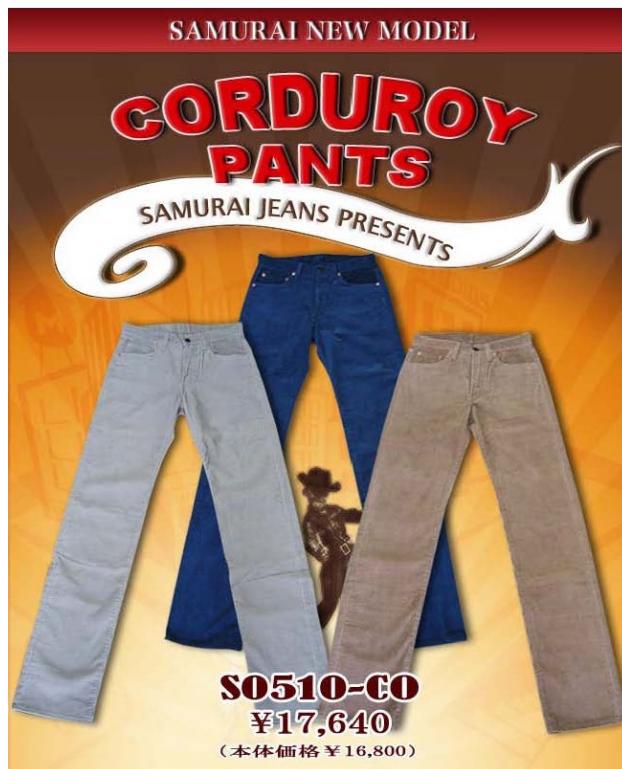


Exhibit F-2



Exhibit F-3



Exhibit F-4

**JOHN BULL John bull
SEWING CHOP
#508BD**



**JOHN BULL
SEWING CHOP
508BD**

The model which from the sixties latter half is made on the basis of the XX of Levi's of seventies first half.

**JOHN BULL John bull
SEWING CHOP
#513BD**



Exhibit F-6